

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

In re:		Chapter 11
SOUTHCROSS HOLDINGS LP, et al,		Case No. 16-20111
Debtors		Jointly Administered

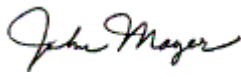
**OBJECTION OF CATERPILLAR FINANCIAL SERVICES CORPORATION
TO THE DEBTORS' MOTION FOR INTERIM AND FINAL ORDERS
AUTHORIZING THE DEBTORS TO PAY CERTAIN PREPETITION
CLAIMS IN THE ORDINARY COURSE OF BUSINESS
(doc 14)**

Comes now Caterpillar Financial Services Corporation (“Caterpillar Financial”) a creditor and party in interest and objects to the Debtors’ Motion for Entry of Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Claims in the Ordinary Course of Business (doc 14, the “Motion”), and respectfully represents:

1. The Motion would authorize the Debtors to pay prepetition claims and debts which are not entitled to any priority ahead of other allowed unsecured claims.
2. The Motion states no basis for payment of the unsecured creditors whose claims they wish to pay as critical vendors or sole source suppliers. There must be a showing of cause in order for the Court to authorize payment of prepetition claims of critical vendors, and a showing of the probability of harm to the estate if the critical vendors are not paid. *In re Kmart Corp.*, 359 F.3d 866 (7th Cir. 2004).

Respectfully submitted,

ROSS, BANKS, MAY, CRON & CAVIN, P.C.

By: 

John Mayer

Texas Bar Number 13274500

Southern District of Texas Number 502092

7700 San Felipe, Suite 550

Houston, Texas 77063

Phone 713-626-1200

Fax 713-623-6014

Email jmayer@rossbanks.com

Attorney for Caterpillar Financial
Services Corporation

CERTIFICATE OF SERVICE

I certify that true copies of this objection were served upon all persons and parties who have entered an appearance in this case electronically by means of the Court's CM/ECF system on March 30, 2016.



John Mayer